

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

ESTATE OF ANTHONY KADE DAVIS,	)	
On behalf of the deceased, Anthony Kade Davis,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. CIV-17-807-SLP
	)	
(1) THE SHERIFF OF CANADIAN COUNTY,	)	
a political subdivision, and	)	
	)	
(2) THE BOARD OF COUNTY	)	
COMMISSIONERS OF CANADIAN COUNTY	)	
, a political subdivision	)	
	)	
Defendants.	)	

**PLAINTIFF'S OBJECTIONS TO DEFENDANTS' EXHIBITS**

Pursuant to the Court's Scheduling Order [Dkt. 14], Plaintiff Estate of Anthony Kade Davis hereby submits the following objections to Defendant's Exhibits [Dkt. 45].

No.	Exhibit	Objection
1.	Anthony Kade Davis Booking and Release Sheets from the Canadian County Jail from May 31, 2016 and June 5, 2016.	Relevance, Prejudicial; Hearsay, Character Evidence, Authentication Confusing, Misleading FRE 401-403; 404; 800-802; 901
2.	Anthony Kade Davis' Medical Questionnaire completed during booking May 31, 2016.	Relevance, Prejudicial; Hearsay, Character Evidence, Authentication Confusing, Misleading FRE 401-403; 404; 800-802; 901
3.	Medical Examiner's report and findings, including test results.	Relevance, Prejudicial; Hearsay, Character Evidence, Authentication Confusing, Misleading FRE 401-403; 404; 800-802; 901
4.	Anthony Kade Davis' medical records from Mercy – El Reno on March 23, 2013.	Relevance, Prejudicial; Hearsay, Character Evidence, Authentication Confusing, Misleading FRE 401-403; 404; 800-802; 901
5.	Anthony Kade Davis' medical records from Mercy – El Reno on February 23, 2014.	Relevance, Prejudicial; Hearsay, Character Evidence, Authentication Confusing, Misleading FRE 401-403; 404; 800-802; 901

6.	Anthony Kade Davis' medical records from Mercy – El Reno on April 7, 2016.	Relevance, Prejudicial; Hearsay, Character Evidence, Authentication Confusing, Misleading FRE 401-403; 404; 800-802; 901
7.	Anthony Kade Davis' medical records from Mercy – El Reno on April 12, 2016.	Relevance, Prejudicial; Hearsay, Character Evidence, Authentication Confusing, Misleading FRE 401-403; 404; 800-802; 901
8.	Report prepared by Miranda Huerta, LPN dated June 6, 2016	Relevance, Prejudicial; Hearsay, Character Evidence, Authentication Confusing, Misleading FRE 401-403; 404; 800-802; 901
9.	Medical Progress Note Forms and medical records of Turn Key Health made during incarceration of Anthony Kade Davis.	Relevance, Prejudicial; Hearsay, Character Evidence, Authentication Confusing, Misleading FRE 401-403; 404; 800-802; 901
10.	Recorded Interview of Marlene Cannon by OSBI Agent Solorzano.	Relevance, Prejudicial; Hearsay, Character Evidence, Authentication Confusing, Misleading FRE 401-403; 404; 800-802; 901
11.	Policies and Procedures of the Canadian County Detention Center.	Relevance, Prejudicial; Hearsay, Character Evidence, Authentication Confusing, Misleading FRE 401-403; 404; 800-802; 901
12.	Training records of jailers employed by the Canadian County Jail in 2016 who are identified as witnesses for the Defendants.	Relevance, Prejudicial; Hearsay, Character Evidence, Authentication Confusing, Misleading FRE 401-403; 404; 800-802; 901
13.	All documents listed by the Plaintiff, not otherwise objected to by Defendants.	

Respectfully submitted,

s/ J. David Ogle

J. David Ogle, OBA No. 17476  
Greg Mitchell, OBA No. 17675  
Babbit, Mitchell & Ogle  
9905 S. Pennsylvania Avenue  
Oklahoma City, Oklahoma 73159  
Telephone: (405) 692-7676  
Facsimile: (405) 692-7670  
Email(s): [david@bmolawok.com](mailto:david@bmolawok.com)  
[greg@bmolawok.com](mailto:greg@bmolawok.com)  
ATTORNEY FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

I hereby certify that on November 6, 2018, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrant:

Stephen L. Gerles  
COLLINS ZORN & WAGNER, P.C.  
429 N.E. 50th Street, Second Floor  
Oklahoma City, OK 73105-1813  
Email: slg@czwlaw.com

ATTORNEY FOR DEFENDANT(S)  
SHERIFF OF CANADIAN COUNTY  
BOARD OF COUNTY  
COMMISSIONERS OF CANADIAN  
COUNTY

s/ J. David Ogle

J. David Ogle, OBA No. 17476